

Application No. 10/716,149  
Amendment and Response dated July 19, 2005  
Reply to Office Action mailed April 19, 2005

### **REMARKS**

The present Amendment is in response to the Examiner's Office Action mailed April 19, 2005. Claims 1-27 were pending. Claims 1, 3, 5, 10, 13, and 20 are amended. Claims 1-27 remain pending in view of the above amendments.

Reconsideration of the application is respectfully requested in view of the above amendments to the claims and the following remarks. For the Examiner's convenience and reference, Applicants' remarks are presented in the order in which the corresponding issues were raised in the Office Action.

Please note that the following remarks are not intended to be an exhaustive enumeration of the distinctions between any cited references and the claimed invention. Rather, the distinctions identified and discussed below are presented solely by way of example to illustrate selected differences between the claimed invention and the cited references. In addition, Applicants request that the Examiner carefully review any references discussed below to ensure that Applicants' understanding and discussion of the references, if any, is consistent with the Examiner's understanding.

#### **A. Rejections Under 35 U.S.C. § 102**

The Office Action rejects claims 1, 2, 4, 5, 10, 12, and 16 under 35 U.S.C. § 102(b) as being anticipated by United States Patent No. 6,305,848 to *Gregory*. However, *Gregory*—assuming *arguendo* that it and the other references cited herein qualify as prior art—fails to teach each and every element of the pending claims and thus is not an anticipatory reference.

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*Gregory* generally discloses a high density blindmate optoelectronic module. In particular, *Gregory* teaches an optoelectronic module 10 configured to mount on a rear edge of a motherboard 14. The optoelectronic module is further configured to interface with a mating optical connector 12, thereby connecting the optoelectronic module to a plurality of optical fibers of the mating optical connector. The optoelectronic module further includes a transceiver mounting block 16 that defines apertures 18 that are each configured to receive a connectorized optical sub-assembly 28. Each optical sub-assembly in turn includes a pair of optical transmitters 60, 62 and a pair of optical receivers 64, 66 positioned within a cavity 67 of the optical sub-assembly. Each optical sub-assembly is mounted to a daughter card 20, which in turn is connected to the mother board. *See Gregory*, col. 4, l. 49 – col. 5, l. 36; Figs. 2-5.

The claimed invention is substantially distinct from the device taught by *Gregory*. In particular independent claim 1 requires, in an optoelectronic module array system, the presence of a host board, a plurality of daughter cards that are each connected to the host board, and “a plurality of optoelectronic modules that are each *selectively and removably* connected to a respective one of the daughter cards.” *Gregory* discloses no such module array system. In contrast, *Gregory* teaches an optical sub-assembly 28 and a respective daughter card 20 that are not removably connected, but rather connected by a solder joint. This is seen in col. 5, ll. 64-67 of *Gregory*, which state:

The electrical leads 84 extending from the back end of the connectorized optical sub-assembly 28 *are soldered* to solder pads 72 formed on a surface of the daughter card 20. (Emphasis added.)

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Indeed, no suggestion or motivation for removal of the optical sub-assembly 28 from its connection with the daughter card appears to exist in *Gregory*. While removal of the daughter cards 20 from the mother board 14 is discussed, no such removal is disclosed regarding a removable connection between the optical sub-assembly and its respective daughter card. This point is further bolstered by the discussion in *Gregory*, col. 5, l. 67 – col. 6, l. 4, which describes the circuitry and components located on the daughter card 20 that are needed for operation of the optical transmitters and receivers of the optical sub-assembly 28, thereby suggesting an integral connection between the optical sub-assembly and daughter card of *Gregory*.

*Gregory* therefore neither teaches nor suggests optoelectronic modules that are selectively and removably connected to a daughter card of an optoelectronic module array system, as required by independent claim 1 of the present invention. Consequently, *Gregory* fails to teach or suggest each and every element of claim 1 and thus cannot be used to anticipate the present invention. Further, inasmuch as claims 2-9 are variously dependent on independent claim 1, they are also allowable for at least the reasons given above. Applicant therefore respectfully submits that each of the above claims is patentably distinct and requests that the Section 102 rejection in view of *Gregory* be withdrawn.

Independent claim 10 is also patentably distinct from *Gregory*. In particular, claim 10 discloses an optical transceiver module array system, including a host board, a plurality of daughter cards that are each operably connected to the host board, and “a plurality of transceiver modules that are each removably connected to a respective one of the daughter cards.” As discussed above, *Gregory* fails to teach at least this limitation. Thus claim 10 and dependent

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claims 11, 12, 14, and 15 that depend therefrom are allowable, and the Section 102 rejection in view of *Gregory* should be withdrawn.

Finally, Applicants submit that independent claim 16 is patentably distinct from *Gregory*. In particular, independent claim 16 discloses an optical transceiver module array system, including a host board, a plurality of daughter cards connected to the host board, "*a plurality of cages that are each connected to a respective one of the daughter cards,*" and "*a plurality of transceiver modules that are each received by a respective one of the cages.*" *Gregory* fails to teach such a device as required by independent claim 16. Indeed, while the Office Action alleges that the cavity 67 shown in Figure 4 of *Gregory* contains optical transmitter and receiver elements of the optical sub-assembly 28 and thus serves as some type of "cage," Applicants note that the cavity 67 *itself* forms part of the optical sub-assembly 28 of *Gregory*. As such, the cavity 67 is physically incapable of receiving itself, *i.e.*, the optical sub-assembly 28, therein. Rather, *Gregory* at most describes a single block, *i.e.*, the transceiver mounting block 16, that receives all of the optical sub-assemblies 28. No suggestion or motivation to the contrary appears to be taught by *Gregory*.

In light of the above, *Gregory* fails to anticipate the present claimed invention embodied in claim 16. Accordingly, the rejection under Section 102 of this claim and each of its dependent claims 17-19, should be withdrawn.

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**B. Rejections Under 35 U.S.C. § 103**

The Office Action rejects claims 3, 9, and 17 under 35 U.S.C. § 103(a) as being unpatentable over *Gregory* as applied to claims 1 and 16. Also, claim 6, 18, and 19 are rejected under Section 103(a) as being unpatentable over *Gregory* in view of United States Patent No. 6,358,066 to Gilliland, *et al.* ("*Gilliland*").

Applicants note that each of the above rejections is at least partly based upon the *Gregory* reference. It is further noted that each of the above rejected claims is variously dependent upon one of the independent claims 1 and 16. As was previously discussed, the teachings of *Gregory* are inapplicable to the present invention as applied to independent claim 1 or 16 for failing to teach or suggest each of the limitations contained in those claims. Thus, *Gregory* is equally inapplicable to the present claims rejected under Section 103 for at least the same reasons, that is, its failure to teach or suggest all of the claim limitations contained not only in independent claim 1, but also the limitations contained in the present rejected dependent claims. Thus, the Examiner has failed to make out a *prima facie* case of obviousness. Applicants therefore submit that claims 2, 4, 5, 7, 8, and 11-15 are allowable and that the above rejection under Section 103 should be withdrawn.

**C. Allowable Subject Matter**

The Office Action objects to claims 7, 8, 11, 13-15, and 20-27 as being dependent upon rejected base claims, but states that these claims would be allowable if rewritten in independent form to include all the limitations of the base claim and any intervening claims. In response,

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Applicants have rewritten claims 13 and 20 in independent form to include all of the limitations of the base claim and any intervening claims. As such, Applicants respectfully submit that claims 13 and 20, together with the claims that depend therefrom, are allowable and request that the objection to these claims be withdrawn.

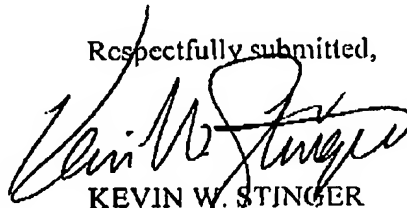
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### CONCLUSION

In view of the foregoing, Applicants believe that each of the pending claims 1-27 is now in condition for allowance. Therefore, reconsideration of the rejections is requested and allowance of those claims is respectfully solicited. In the event that the Examiner finds any remaining impediment to a prompt allowance of this application that can be clarified in a telephonic interview, the Examiner is respectfully requested to initiate the same with the undersigned attorney.

Dated this 19<sup>th</sup> day of July, 2005.

Respectfully submitted,



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